

# **EXHIBIT 9**

# **REDACTED**

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF VIRGINIA  
3 ALEXANDRIA DIVISION

- - -

4 UNITED STATES, et al., :  
5 : NO.  
6 Plaintiffs, : 1:23-cv-00108  
7 : -LMB-JFA  
8 v. :  
9 :  
10 GOOGLE LLC, :  
11 :  
12 Defendants. :  
13

14 - HIGHLY CONFIDENTIAL -

15 - - -

16 August 28, 2025

17 - - -

18 Videotaped deposition of  
19 JASON NIEH, Ph.D., taken pursuant to  
20 notice, was held at the office of Dunn  
21 Isaacson Rhee, 401 9th Street NW, 8th  
22 Floor, Washington, D.C., beginning at  
9:03 a.m., on the above date, before  
Michelle L. Ridgway, a Registered  
Professional Reporter, Certified  
Shorthand Reporter, Certified Realtime  
Reporter, Certified Court Reporter, and  
Notary Public.

- - -

<p style="text-align: right;">Page 174</p> <p>1 Q. Okay. In addition to those</p> <p>2 hourly billing rates, do you charge</p> <p>3 anything else in connection with your</p> <p>4 work on Google matters, such as work</p> <p>5 performed by support staff?</p> <p>6 A. I don't charge for work</p> <p>7 performed by support staff.</p> <p>8 Q. Okay. And do you receive</p> <p>9 any compensation in connection with work</p> <p>10 performed by others in connection with</p> <p>11 your work for Google?</p> <p>12 A. Not that I'm aware of. I</p> <p>13 don't think so.</p> <p>14 Q. Okay. You described</p> <p>15 yourself in the opening pages of your</p> <p>16 first expert report, which we've marked</p> <p>17 as Exhibit 1, as an independent expert.</p> <p>18 What did you mean by the</p> <p>19 word "independent" in your report, in</p> <p>20 that context?</p> <p>21 A. Sorry. Where are you</p> <p>22 referring to?</p>	<p style="text-align: right;">Page 176</p> <p>1 generally, in this context, means I'm</p> <p>2 speaking as my -- in my role as my --</p> <p>3 as -- as -- in offering my expertise</p> <p>4 from my independent perspective.</p> <p>5 Q. Independent from what?</p> <p>6 A. Independent from the</p> <p>7 opinions, if you will -- whatever</p> <p>8 anybody else's opinion is, if you will.</p> <p>9 I try to offer it from my own</p> <p>10 perspective, independent of -- and do my</p> <p>11 own evaluation, if you will, of the --</p> <p>12 of the materials that I consider and</p> <p>13 provide my own views, as opposed to if</p> <p>14 somebody else were to tell me, well,</p> <p>15 this is what you should say, then I</p> <p>16 won't necessarily -- then I would have</p> <p>17 to evaluate whether or not that makes</p> <p>18 sense. And if it doesn't make sense to</p> <p>19 me, then that's not something that I'm</p> <p>20 going to do.</p> <p>21 But I want to be able to</p> <p>22 provide my expertise and my opinions in</p>
<p style="text-align: right;">Page 175</p> <p>1 Q. If you look under --</p> <p>2 Exhibit 1, Page 3, Paragraph 8. You</p> <p>3 say, "I have been asked by counsel for</p> <p>4 Google to provide my opinions as an</p> <p>5 independent technical expert."</p> <p>6 Then on Page 4,</p> <p>7 Paragraph 12, you write, "I understand</p> <p>8 my duty as an independent expert," and</p> <p>9 you refer to "expertise in an</p> <p>10 independent matter."</p> <p>11 You refer to the duty as</p> <p>12 overriding any obligation to any party</p> <p>13 retaining you as an independent expert.</p> <p>14 And then you say this report reflects</p> <p>15 your own independent views.</p> <p>16 So by my count, you used</p> <p>17 the phrase "independent" five times in</p> <p>18 those opening pages of your report. I'm</p> <p>19 just asking what you mean by</p> <p>20 "independent" in that context.</p> <p>21 A. Sure.</p> <p>22 So, "independent,"</p>	<p style="text-align: right;">Page 177</p> <p>1 a way that I'm able to stand behind them</p> <p>2 because that's my view, my own view.</p> <p>3 Q. So when you write that you</p> <p>4 have a duty as an independent expert,</p> <p>5 you mean your duty as an expert that's</p> <p>6 offering your own opinions and not</p> <p>7 someone else's opinions; is that right?</p> <p>8 A. Yeah. Loosely speaking,</p> <p>9 that's what I'm intending. That's</p> <p>10 correct.</p> <p>11 Q. You also write, "I confirm</p> <p>12 that I have no conflict of interest."</p> <p>13 How are you defining</p> <p>14 "conflict of interest" in that sentence?</p> <p>15 A. I think the conflict of</p> <p>16 interest is sort of broadly speaking.</p> <p>17 But, for example, there's no -- say, for</p> <p>18 example, my compensation on the</p> <p>19 assignment is not contingent on any --</p> <p>20 on any specific outcome or view that I</p> <p>21 express with respect to the work that</p> <p>22 I'm doing.</p>

Page 178	Page 180
<p>1 So that's what I mean by --</p> <p>2 my wife is not a director, board</p> <p>3 director at Google, for example. At</p> <p>4 least not as far as I know of.</p> <p>5 So, generally speaking,</p> <p>6 that's what I'm referring to as conflict</p> <p>7 of interest.</p> <p>8 Q. Okay. But obviously you</p> <p>9 are being compensated for Google for</p> <p>10 your time on this matter, correct?</p> <p>11 A. Correct.</p> <p>12 MR. BITTON: Objection to</p> <p>13 form.</p> <p>14 THE WITNESS: I am -- I am</p> <p>15 being compensated for my -- for</p> <p>16 the time that I spend on this</p> <p>17 matter, as is generally the case</p> <p>18 when I do work.</p> <p>19 BY MS. WOOD:</p> <p>20 Q. Okay. Now, Exhibit 1,</p> <p>21 Appendix B, you have a list of materials</p> <p>22 relied upon. And different folks do</p>	<p>1 have been marked as Exhibits 1, 2, and</p> <p>2 3.</p> <p>3 A. Okay.</p> <p>4 Q. Each of them has an</p> <p>5 Appendix B, Materials Relied Upon,</p> <p>6 correct?</p> <p>7 A. Correct.</p> <p>8 Q. And I'm asking is it the</p> <p>9 case that every material that you relied</p> <p>10 upon for purposes of rendering your</p> <p>11 opinions in this case are listed in</p> <p>12 either Appendix B of Exhibit 1,</p> <p>13 Appendix B of Exhibit 2, or Appendix B</p> <p>14 of Exhibit 3?</p> <p>15 A. That was certainly the</p> <p>16 goal. That's what I tried to do.</p> <p>17 Q. And did you separately --</p> <p>18 strike that.</p> <p>19 On Page 11 of Appendix B in</p> <p>20 Exhibit 1, you have a note that's in</p> <p>21 bold and italics and with two asterisks</p> <p>22 that says, "I also relied on any other</p>
Page 179	Page 181
<p>1 this differently.</p> <p>2 I want to understand how</p> <p>3 you understand the material that's</p> <p>4 reflected in Appendix B.</p> <p>5 When you say, "Materials</p> <p>6 Relied Upon," are these all the</p> <p>7 materials that you considered or just</p> <p>8 the ones that you relied on for purposes</p> <p>9 of reaching your opinions in this case?</p> <p>10 A. Appendix B, which refers to</p> <p>11 materials relied upon, are -- are the</p> <p>12 materials that I relied upon for the</p> <p>13 opinions that I have expressed in my</p> <p>14 reports.</p> <p>15 Q. Okay. And Appendix B to</p> <p>16 Exhibits 1, 2, and 3, collectively,</p> <p>17 retain -- contain a reference, all the</p> <p>18 materials that you relied upon to reach</p> <p>19 your opinions in this case, correct?</p> <p>20 A. I'm sorry. I don't follow</p> <p>21 your question. So maybe you can --</p> <p>22 Q. So each of your reports</p>	<p>1 documents and materials cited in this</p> <p>2 Report, but not mentioned in this</p> <p>3 Appendix B."</p> <p>4 What was the distinction</p> <p>5 between those materials that got the</p> <p>6 vaulted status of being included in</p> <p>7 Appendix B -- I'm being a little</p> <p>8 cheeky -- versus just otherwise being</p> <p>9 cited in your report?</p> <p>10 How did you decide which</p> <p>11 was which?</p> <p>12 MR. BITTON: Objection to</p> <p>13 form.</p> <p>14 THE WITNESS: I'm not sure</p> <p>15 about vaulted status, per se;</p> <p>16 however, my goal was to have all</p> <p>17 the materials that I relied upon</p> <p>18 listed in Appendix B.</p> <p>19 But in some -- in a few</p> <p>20 cases there may have been errors</p> <p>21 of omission. And, as a result</p> <p>22 of that, I didn't want to -- and</p>

<p>Page 182</p> <p>1 in those cases, I just wanted to</p> <p>2 indicate that there -- there may</p> <p>3 have been, you know, citations</p> <p>4 that are described in the rest</p> <p>5 of the report, and clearly those</p> <p>6 citations also indicate things</p> <p>7 that I relied upon.</p> <p>8 BY MS. WOOD:</p> <p>9 Q. Okay. So it's sort of a</p> <p>10 catchall. That if you didn't otherwise</p> <p>11 include it, certainly, if it's cited in</p> <p>12 your report, you're relying on it; is</p> <p>13 that fair?</p> <p>14 A. That's correct. Yes.</p> <p>15 Q. Okay. How did you</p> <p>16 determine -- strike that.</p> <p>17 I assumed that you reviewed</p> <p>18 a broader set of materials than the</p> <p>19 materials that you ended up relying on</p> <p>20 for purposes of reaching your opinion.</p> <p>21 Is that a fair assumption?</p> <p>22 A. That is correct.</p>	<p>Page 184</p> <p>1 answer my question. Let me -- let me</p> <p>2 try it this way.</p> <p>3 You refer to testimony</p> <p>4 provided at depositions taken in this</p> <p>5 case. Were you given access to all</p> <p>6 depositions taken in this case, whether</p> <p>7 it was liability phase or remedies</p> <p>8 phase?</p> <p>9 A. So as far as I know, I was</p> <p>10 given access to everything that I needed</p> <p>11 to -- to render the opinions that I</p> <p>12 provided in my reports.</p> <p>13 Q. Who decided whether you</p> <p>14 needed something for purposes of</p> <p>15 rendering an opinion?</p> <p>16 MR. BITTON: Just as a</p> <p>17 caution, I'm just going to</p> <p>18 instruct the witness not to</p> <p>19 reveal communications with</p> <p>20 counsel or support.</p> <p>21 Otherwise, you can answer</p> <p>22 that question.</p>
<p>Page 183</p> <p>1 Q. And, first, let's start</p> <p>2 with what materials did you have access</p> <p>3 to review in connection with your work</p> <p>4 on this matter? What materials were you</p> <p>5 provided?</p> <p>6 A. Well, I mean, if we turn</p> <p>7 to, I think, the beginning of my report,</p> <p>8 I discussed in the methodology</p> <p>9 section --</p> <p>10 Q. What page are you on?</p> <p>11 A. Page 4.</p> <p>12 Q. Yes.</p> <p>13 A. So that I reviewed, for</p> <p>14 example, you know, the notice of</p> <p>15 proposed remedies, technical</p> <p>16 documentation and source code produced</p> <p>17 in this case, interrogatory responses,</p> <p>18 testimony taken at depositions, and</p> <p>19 other documents produced in this</p> <p>20 litigation, as well as a wide variety of</p> <p>21 public documentation that was available.</p> <p>22 Q. Well, this doesn't quite</p>	<p>Page 185</p> <p>1 BY MS. WOOD:</p> <p>2 Q. Well, I don't want you to</p> <p>3 reveal anything you said to your</p> <p>4 lawyers. I'm not trying to -- to invade</p> <p>5 that privilege.</p> <p>6 What I'm asking -- or the</p> <p>7 stipulation between the parties on that</p> <p>8 subject.</p> <p>9 What I'm asking is how did</p> <p>10 you get the materials? Did the lawyers</p> <p>11 give you the materials? You can just</p> <p>12 answer that yes/no, without saying</p> <p>13 anything about your communications with</p> <p>14 them.</p> <p>15 A. So in some cases lawyers</p> <p>16 provided me with materials but not in</p> <p>17 all cases.</p> <p>18 Q. Okay. And with respect to</p> <p>19 the depositions that you reviewed, were</p> <p>20 there any depositions that -- other than</p> <p>21 the ones listed in Appendix B, or</p> <p>22 otherwise referenced in the reports,</p>

Page 186

1 that you did review but didn't rely on?

2 A. I reviewed a lot of

3 material in this case. I don't remember

4 every deposition that I reviewed. It is

5 certainly possible, and likely, that I

6 reviewed depositions that may not be

7 listed here, because I considered them

8 but ended up not relying on them.

9 Q. Do you -- in terms of order

10 of magnitude, there are 15 deposition

11 transcripts referenced -- there are 14

12 on -- in Exhibit 1. And I think

13 Mr. Wolf is listed in one of the

14 subsequent reports.

15 So by my count, you

16 reviewed 15 deposition transcripts.

17 There were many multiples of that

18 depositions taken.

19 So what I'm trying to

20 understand is were you given access to

21 all of the depositions that were taken

22 in the liability phase and the remedies

Page 187

1 phase of this matter, or were you only

2 given access to those that someone else

3 thought were relevant to your opinions?

4 A. I was not only given access

5 to depositions that someone else thought

6 was relevant to my opinions.

7 But with respect to the

8 other question, you're asking me was I

9 given access to all depositions. I

10 don't even know how to -- I don't know

11 how to say -- how do I -- how do I

12 phrase this?

13 Q. It's usually best if you

14 just say it.

15 A. I don't know if I -- I

16 suspect it's not all, but I don't know

17 what "all" is. I guess that's my

18 answer, right?

19 Q. Okay.

20 A. I was given access to

21 whatever -- whatever was produced for

22 sure that -- that -- I don't know how to

Page 188

1 do this, given all the instructions. My

2 apologies.

3 But it was not just

4 whatever else somebody told me, here

5 is -- here is stuff, and you can see

6 them only.

7 Q. Okay. So, for example,

8 this list of deposition transcripts

9 is -- consists of two-thirds of the

10 deposition transcripts you reviewed were

11 of Google employees. I can just

12 represent that math to you, because

13 there were 10 out of 15 that were Google

14 employees.

15 Do you know how many third

16 parties were deposed in connection with

17 this case, and do you know why -- how

18 many third-party deposition transcripts

19 you reviewed?

20 MR. BITTON: Objection to

21 form.

22 BY MS. WOOD:

Page 189

1 Q. Meaning, parties not --

2 individuals not employed by Google.

3 MR. BITTON: Objection to

4 form.

5 THE WITNESS: I do not

6 know how many third parties were

7 deposed in this case.

8 BY MS. WOOD:

9 Q. Okay. And did you ask to

10 see the deposition transcripts of all

11 the third parties that were deposed in

12 this case?

13 MR. BITTON: I'm going to

14 instruct the witness not to

15 reveal any communications with

16 counsel or support.

17 MS. WOOD: Well, I'm not

18 asking about the communication

19 itself.

20 BY MS. WOOD:

21 Q. I'm asking about the

22 materials you had access to for purposes

Page 190

1 of arriving at your opinion.  
 2 And I just want to know if  
 3 you had access -- maybe you can answer  
 4 it. But if you had access to all the  
 5 depositions or only some.  
 6 MR. BITTON: Just to  
 7 clarify the instruction. You  
 8 can't reveal communications, but  
 9 you can answer what you had  
 10 access to.  
 11 I think that's the  
 12 distinction I'm trying to draw  
 13 here.  
 14 THE WITNESS: I had access  
 15 to what was -- what I needed to  
 16 for doing my reports. I don't  
 17 know if I can represent --  
 18 I'm -- if I had to guess, I  
 19 certainly didn't read all the  
 20 depositions. I don't know if  
 21 there were some that I didn't  
 22 have access to.

Page 191

1 So I hope that answers  
 2 your question.  
 3 BY MS. WOOD:  
 4 Q. Well, I guess I'm not clear  
 5 on how you know you had access to what  
 6 you needed if you don't know what you  
 7 didn't get.  
 8 MR. BITTON: Objection to  
 9 form.  
 10 BY MS. WOOD:  
 11 Q. How do you know you had  
 12 access to what you needed if you don't  
 13 know whether you got all the material  
 14 that was available?  
 15 A. Because I produced three  
 16 reports, and I expressed the opinions  
 17 that I had in the three reports.  
 18 Certainly, that is based on the material  
 19 that I relied upon.  
 20 I certainly had access to  
 21 more material than what I relied upon,  
 22 because there were other materials that

Page 192

1 I also considered. And that was  
 2 sufficient for me to substantiate the  
 3 opinions that I expressed in my three  
 4 reports.  
 5 And so that's what I mean  
 6 by I had access to what was necessary  
 7 for me to write my reports.  
 8 Q. Okay. So your  
 9 definition --  
 10 MR. BITTON: Counsel,  
 11 we're more -- we're well over an  
 12 hour, so let's take a break.  
 13 BY MS. WOOD:  
 14 Q. Your definition of what you  
 15 needed is --  
 16 MR. BITTON: Counsel, I  
 17 asked -- I requested a break,  
 18 and you're just ignoring me.  
 19 MS. WOOD: We are in the  
 20 middle of a -- I can ask one  
 21 more question. Can you wait for  
 22 a break for me to ask one more

Page 193

1 question?  
 2 MR. BITTON: I asked for a  
 3 break. I guess you're not  
 4 accommodating that courtesy.  
 5 MS. WOOD: Of course I'm  
 6 accommodating the break, but I  
 7 think you're interrupting --  
 8 MR. BITTON: Second time  
 9 you ignored me when I asked  
 10 that, counsel.  
 11 MS. WOOD: That is not  
 12 true. I asked the witness last  
 13 time, and when the witness said  
 14 yes, I said absolutely.  
 15 I'd like to finish this  
 16 line of examination. I don't  
 17 think that's in any way  
 18 unorthodox or inappropriate.  
 19 MR. BITTON: Counsel, last  
 20 time and this time when I asked  
 21 the question, you kept on asking  
 22 your questions, and you

<p>Page 286</p> <p>1 opinions in this matter, correct?</p> <p>2 A. Exhibit 4 is material that</p> <p>3 I relied on as part of the opinions that</p> <p>4 I've expressed in my reports.</p> <p>5 Q. Okay. And Exhibit 4 has a</p> <p>6 title at the top, Slaughter and May.</p> <p>7 Do you see that?</p> <p>8 A. I see Slaughter and May at</p> <p>9 the top of Exhibit 4.</p> <p>10 Q. And Slaughter and May is</p> <p>11 the law firm that retained you in</p> <p>12 connection with the European Commission</p> <p>13 matter, correct?</p> <p>14 A. Slaughter and May is one of</p> <p>15 the law firms that retained me as part</p> <p>16 of my work in the European Commission</p> <p>17 matter.</p> <p>18 Q. And for what purpose did</p> <p>19 you rely -- what aspects of this</p> <p>20 document did you rely upon in reaching</p> <p>21 your opinions in this case?</p> <p>22 A. My recollection is that</p>	<p>Page 288</p> <p>1 materials that I relied upon, a variety</p> <p>2 of materials that I relied upon.</p> <p>3 I, in some cases, may have</p> <p>4 been conservative in terms of the list</p> <p>5 of documents that I provided, but it is</p> <p>6 something that I certainly considered as</p> <p>7 part of my analysis, prior to July 7th.</p> <p>8 Q. Well, we talked earlier</p> <p>9 today, and I asked you specifically what</p> <p>10 you meant by "materials relied upon,"</p> <p>11 and you explained those were materials</p> <p>12 that you relied upon as distinct from</p> <p>13 materials that you considered, right?</p> <p>14 MR. BITTON: Objection to</p> <p>15 form.</p> <p>16 BY MS. WOOD:</p> <p>17 Q. Do you recall that?</p> <p>18 A. Yes, I do. And I would say</p> <p>19 that that is certainly generally the</p> <p>20 case.</p> <p>21 But what I try to do in</p> <p>22 terms of my practice in -- in writing</p>
<p>Page 287</p> <p>1 Dr. Bjedov presented some discussion of</p> <p>2 timeframes in relationship to this</p> <p>3 document, and as part of that, given</p> <p>4 that she presented that relation to the</p> <p>5 document, my report responds to some of</p> <p>6 her claims.</p> <p>7 Q. Well, you understand that</p> <p>8 you relied on this document and listed</p> <p>9 this document in your Materials Relied</p> <p>10 Upon before -- on or before July 7,</p> <p>11 2025; isn't that right?</p> <p>12 A. Correct.</p> <p>13 Q. And as of July 7, 2025, you</p> <p>14 weren't aware of Dr. Bjedov's report,</p> <p>15 correct?</p> <p>16 A. That is correct.</p> <p>17 Q. So you relied on this</p> <p>18 document, in your own report, to reach</p> <p>19 your own conclusions as of July 7, 2025,</p> <p>20 correct?</p> <p>21 A. So it was certainly the</p> <p>22 case that I tried to list my -- the</p>	<p>Page 289</p> <p>1 the reports is, for the various opinions</p> <p>2 and in various sections of the report</p> <p>3 that I wrote, that there are a variety</p> <p>4 of citations that you may find</p> <p>5 throughout the reports.</p> <p>6 And what I'm indicating is</p> <p>7 there may be some materials that are</p> <p>8 listed in the Materials Relied Upon</p> <p>9 portion of the appendix for which I</p> <p>10 provide no direct citation in the other</p> <p>11 portion of the report.</p> <p>12 So it's certainly something</p> <p>13 that I read and, in that sense, relied</p> <p>14 on, but I don't recall whether or not</p> <p>15 there was a direct opinion expressed in</p> <p>16 my report, based on this specific</p> <p>17 document. So that's all I'm trying to</p> <p>18 represent to you.</p> <p>19 Q. What do you understand</p> <p>20 Exhibit 4 to be?</p> <p>21 A. Do you mind if I take a</p> <p>22 moment to review?</p>



Page 290

1 Q. Sure.

2 A. Thank you.

3 Q. And while you're reviewing

4 it, let me just ask one other question,

5 and then I'll repeat my last question.

6 When you reviewed Exhibit 4

7 in connection with this matter, were

8 portions of it redacted, the same

9 portions redacted as I've just shown you

10 in Exhibit 4, or did you have a version

11 of this document with no redactions?

12 A. I don't recall ever seeing

13 this document without redactions.

14 Q. Okay. And in connection

15 with your work with the European

16 Commission matter, did you ever see this

17 document without redactions at the time

18 you were working for Slaughter and May?

19 A. In connection with the work

20 on the European Commission matter, I

21 don't recall ever seeing this document.

22 Q. When was the first time you

Page 291

1 recall ever seeing the document?

2 A. In my work on this case.

3 Q. When?

4 A. Sometime within the last

5 couple months, I think.

6 Q. And how confident are you

7 that at the time that you were working

8 on the European Commission matter with

9 Slaughter and May, you never saw any

10 version of this document, Exhibit 4?

11 MR. BITTON: Objection to

12 form. Asked and answered.

13 THE WITNESS: I would say

14 I'm highly confident. I don't

15 recall anything -- reviewing

16 anything in the context that --

17 that looked like this, with the

18 heading and everything that

19 you've described.

20 BY MS. WOOD:

21 Q. Putting aside the format or

22 the heading, as a substantive matter in

Page 292

1 connection with your work on the

2 European Commission matter with

3 Slaughter and May, did you recall

4 reviewing [REDACTED]

5 [REDACTED]

6 [REDACTED]?

7 MR. BITTON: Objection to

8 form.

9 THE WITNESS: I'm sorry.

10 Can you repeat the question,

11 please.

12 BY MS. WOOD:

13 Q. Putting aside the format or

14 the heading, as a substantive matter in

15 connection with your work in the

16 European Commission matter with

17 Slaughter and May, do you recall

18 reviewing [REDACTED]

19 [REDACTED]

20 [REDACTED]?

21 A. Outside of the -- just to

22 be clear, outside of the context of the

Page 293

1 reports that I myself wrote, I don't

2 recall such documents.

3 Q. Okay. And sorry. Take

4 your time to look at the document.

5 A. Okay. Thank you.

6 Q. Just to refresh, my

7 question that was pending before I

8 interrupted myself and you was what do

9 you understand Exhibit 4 to be?

10 Can you answer my question?

11 A. Yeah. [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 Q. And do you see [REDACTED]

20 [REDACTED], for example?

21 MR. BITTON: Objection to

22 form.